

1 of directors would be the common thread.

2 Q And that would also be the case when you add Nevis,  
3 Guatemala and Italy?

4 A Yes.

5 Q Please turn to Mass Media Exhibit 101.

6 A Yes, sir.

7 Q Focus initially on the first paragraph.

8 A Yes, sir, I've read that.

9 Q And you see that the listing of companies includes  
10 both Translator TV, Inc. and Community Educational Television?

11 A Yes.

12 Q Now, are -- would it be your testimony that  
13 Translator TV, Inc. is there as an affiliate but not as an  
14 owned and operated company?

15 A Yes, sir.

16 Q I'd like you to turn to page 3, the middle of the  
17 page, the paragraph, "The board discussed the 1984 audited  
18 financial statements", do you see that?

19 A Yes.

20 Q Do you recall there being any discussion among the  
21 board members of Translator TV, Inc. as to the information  
22 that appeared in the 1984 financial statement?

23 Q I'm sure we all discussed all of the individual  
24 stations' financial statements but again my memory isn't good  
25 enough to recall any specific discussion with regard to TTI.

1 Q Well, you will recall that from the 1984 financial  
2 statement that Translator TV, Inc. now had a negative fund  
3 balance that was \$277,000 plus.

4 A I remember that.

5 Q But no discussion among the board members as to how  
6 that figure came to be or what was going on?

7 A Nothing that I recall and certainly if we had I  
8 think that the problem with that would have been discovered  
9 and corrected even earlier than it was.

10 Q Now, looking at page 4.

11 A Yes, sir.

12 Q The officers and directors, there's the second to  
13 the last entry is for Translator Television, Inc.

14 A Yes, sir.

15 Q Once again we have your brother Philip as an  
16 assistant secretary, was there any different reason for having  
17 him added as a -- or continuing him, I should say, as  
18 assistant secretary in 1986 from that which we had discussed  
19 relative to 1985?

20 A Only for the same purposes that I've enumerated a  
21 number of times.

22 Q Please turn to Mass Media Exhibit 102.

23 A Yes, sir.

24 Q And on the first page I'd like you to look at the  
25 second paragraph.

1           A     Yes, sir, I've seen it.

2           Q     All right, again you will see that in the second  
3 sentence there is a reference to "we" and "twenty-six low and  
4 medium-power stations", or twenty-six low and medium stations.

5           A     Yes.

6           Q     Do you see that?

7           A     Yes, sir.

8           Q     Do you have any recollection as to whether that "we"  
9 is supposed to include Translator TV, Inc.?

10          A     Again, Mr. Shook, in the context of a newsletter, I  
11 always intended the "we" to mean the broadest context of the  
12 network including the viewers, the partners and even the  
13 supporters of the network through its various corporations and  
14 affiliated corporations.

15          Q     Moving on to the next paragraph, it reads "now we  
16 wait for FCC approval on Canton, Akron, Ohio, Bloomington,  
17 Indianapolis plus one other major American city which I cannot  
18 mention just yet." The "we" in that context is Trinity owned  
19 and operated companies, is it not?

20          A     It would be both.

21          Q     In the broad sense plus in the narrow sense which  
22 I've just mentioned.

23          A     In the broad -- yes, sir.

24          Q     Now, the next sentence, "besides all this, we are  
25 building ten more low-power stations, four more high-power

1 affiliated stations and two more full-power educational  
2 stations". Now, the "we" there is again in the broad sense  
3 which you have stated previously?

4 A Yes, the "we" would be the broadest sense of the  
5 network and then in addition to the "we" I bring it down and  
6 classify it a little more narrowly with the affiliated and the  
7 educational stations.

8 Q So the reference to four more high-power affiliated  
9 stations is a direct reference to companies that are not owned  
10 and operated by TBN.

11 A And do not have any commonality of board members.

12 Q But in terms of the educational stations what  
13 companies are we talking about there?

14 A In this context I'm certain I'm talking about  
15 Community Educational Television.

16 Q Please turn to Mass Media Exhibit 104.

17 A Yes, sir.

18 Q This is now June 1986 and I'd like you to focus your  
19 attention on the third paragraph that begins "First of all".

20 A Yes, sir, I see that.

21 Q I take it your understanding that is noted there was  
22 acquired from counsel about the limit that the FCC has as to  
23 the ownership of one company, that being twelve.

24 A I'm sure that's the case, it was just well-known to  
25 me at the time that the limit had been raised from seven to

1 twelve.

2 Q Moving on to the next paragraph, in terms of the  
3 second sentence that reads "We formed another company", do you  
4 see that?

5 A Yes.

6 Q Now, what is the -- what is meant by the "we" there?

7 A It's not exactly a totally accurate statement. The  
8 other company referred to here I believe was the Paradise  
9 Acres Corporation that was already in existence that had been  
10 donated to Trinity Broadcasting, the name of which was changed  
11 subsequently to Community Educational Television so "we" I  
12 suppose, in this context, would not only be the broad term but  
13 also Trinity Broadcasting -- probably should have said  
14 acquired another company some years ago called Community  
15 Educational Television.

16 Q Now, then, moving on to the next sentence, "We are  
17 now qualified and have been granted", etc. Do you see that?

18 A Yes.

19 Q Now is the "we" there supposed to be TBN or is it  
20 supposed to be something else?

21 A The "we" there is probably CET since it is the  
22 entity that was qualified and had been granted the two  
23 educational stations in Harlingen and Beaumont.

24 Q Moving on to the next paragraph, just read it to  
25 yourself.

1 A Yes, sir, I have read it.

2 Q Now, in the last two sentences, specifically the  
3 last sentence it says "in addition, we are building", etc.

4 A Yes.

5 Q Now, what is the "we" there?

6 A Again it would be both the broad sense and, in this  
7 case, also in the narrower sense, Trinity Broadcasting  
8 Network, I believe.

9 Q Now, I'd like you to turn to the fourth page of this  
10 document. Now, do you recall having any involvement in the  
11 preparation of the listings that appear here?

12 A I believe I did. I'm -- either myself or some of  
13 the senior staff and Mrs. Duff also helped us track who was  
14 involved with which entity but I'm sure I reviewed and maybe  
15 even helped in the compilation of this list.

16 Q Well, you'll notice at the top, the first category  
17 of stations are TBN owned and operated full-power stations.  
18 You see that?

19 A Yes, sir.

20 Q And there we have the full compliment of twelve.

21 A Yes.

22 Q "Although in the case of Dallas, we recognize that  
23 we're waiting for FCC approval at this point".

24 A Yes, sir.

25 Q Now, moving on down, you see that there is a

1 category "TBN owned and operated educational stations".

2 A Yes.

3 Q And that those stations that are listed there are  
4 Harlingen and Beaumont.

5 A Yes.

6 Q Now, those are Community Educational Television  
7 stations, correct?

8 A Yes, sir.

9 Q Although in this newsletter, they're noted as TBN  
10 owned and operated.

11 A I think the reason for that, sir, is because that at  
12 this point in time I believe that a majority of the board of  
13 directors for Trinity was also a majority of the board of  
14 directors of CET so thereby I guess the term owned and  
15 operated came into play.

16 Q Now, I also note that the next entry after that says  
17 "TBN full-power affiliates" and there are a listing of  
18 stations and markets there, do you see that?

19 A Yes, sir.

20 Q Now, am I correct that the stations and markets that  
21 are listed there pertain to licensees that are not -- that  
22 have no connection in terms of board membership with Trinity?

23 A That is correct, only of programming.

24 Q Only a programming affiliation.

25 A Program affiliation.

1 Q Now, please turn to Mass Media Exhibit 105.

2 A Yes, sir.

3 Q Now, you may wish to look at two other documents at  
4 the same time after I point out something to you in order to  
5 orient you. You'll note that this bill is for June 12, 1986  
6 and that it covers a period for services rendered May 9  
7 through June 6, 1986.

8 A Yes.

9 Q Do you see that?

10 A Yes, sir.

11 Q Now, if you look under "Services Rendered" the last  
12 entry before you reach total hours --

13 A Yes.

14 Q Do you see Translator TV, Inc. there?

15 A Yes, sir.

16 Q Now, you may recall from prior statement that  
17 Translator TV, Inc. wasn't there.

18 A Right.

19 Q This is the first time that we have found Translator  
20 TV, Inc.

21 A Yes, sir.

22 Q Can you fix anything in your mind that occurred  
23 between May 9 and June 6, 1986 that would warrant the addition  
24 of Translator TV, Inc. to this month's statement?

25 A I know of nothing specifically, sir, but evidently



1 some service was rendered by Mr. May's firm that triggered a  
2 charge to Translator TV, Inc. I can only assume that.

3 Q No, I'm not asking you to assume anything, I'm just  
4 asking if you recall there being any event which would warrant  
5 addition of Translator TV, Inc. to this statement.

6 A I can recall no specific event.

7 Q Likewise, going back to the time when Translator TV,  
8 Inc. had its certifications prepared, when we looked at the  
9 following statements there was no reference to Translator TV,  
10 Inc. in the bills. Do you have any understanding or any  
11 knowledge as to why that was the case?

12 A No, sir.

13 Q If I were to tell you that your first contact with  
14 Al Roever took place during this period of time, would that  
15 help your recollection?

16 A Yes, sir, it would.

17 Q Do you recall being in the Odessa-Midland area in  
18 the spring of 1986 and having contact with Mr. Roever over the  
19 telephone?

20 A No, sir, I have never visited Midland-Odessa, at  
21 least in the context of the acquisition of the TV station  
22 there but it would appear then that this may have included the  
23 preparation of a purchase agreement then on behalf of  
24 Translator TV, Inc. by Mr. May for the acquisition of the  
25 Odessa station.

1 Q No, at this point I'm just asking whether you recall  
2 anything, you know, if you don't remember, that's fine, you  
3 don't have to try to reconstruction or speculate.

4 A No, I was not involved in nor do I recall any  
5 specific activity with regard to Mr. May's offering.

6 Q With the addition of Translator TV, Inc. to this  
7 bill, do you recall this bill being brought to your attention  
8 that this is something new, that we haven't had Translator TV,  
9 Inc. before and now all of a sudden here it is?

10 A No, sir, as I've testified, Mrs. Duff basically  
11 reviewed and looked over these invoices from Mr. May's firm.

12 Q Please turn to Mass Media Exhibit --

13 JUDGE CHACHKIN: Well, we'll take a ten-minute  
14 recess at this time.

15 (Off the record at 11:00 a.m. to reconvene at 11:13  
16 a.m.)

17 JUDGE CHACHKIN: All right, back on the record. Go  
18 ahead, Mr. Shook.

19 BY MR. SHOOK:

20 Q Now, Dr. Crouch, could you please turn to Exhibit  
21 107.

22 A 107?

23 Q Yes, sir.

24 A Yes, sir.

25 Q Now, I'd like you to focus briefly on the second

1 page. First of all, that's your signature, is it not?

2 A Yes, sir.

3 Q In terms of the administrative chart, noticing for  
4 -- I notice for Jane Duff that it reflects that she's in  
5 charge of low-power.

6 A Yes.

7 Q Now, as of July 14, 1986 which is the date of this  
8 memo and you can turn to the first page to confirm that --

9 A Um-hum.

10 Q -- is this supposed to be something new or is this  
11 reflective of a situation that had been in effect for some  
12 time, that is, Jane Duff being in charge of low-power?

13 A I think this was just to memorialize the existing  
14 general administrative flow chart for a better understanding  
15 of ourselves and particularly any new personnel coming on  
16 board.

17 Q Now, also with the way this flow chart is put  
18 together, the, you know, top three names are yourself, Mrs.  
19 Duff and your brother Philip. Would I be correct from the way  
20 this chart is put together that Mrs. Duff and your brother  
21 Philip are the assistants to the president at this time?

22 A Pretty much so, Mrs. Duff certainly was, Mr. Philip  
23 Crouch carried the title of chief of staff.

24 Q Now, this memo, if you look at page 1 at the top you  
25 can see that it is directed to all staff.

1           A     Yes.

2           Q     And at this point, is all staff supposed to include  
3 Community Educational Television?

4           A     I think in this context it is pretty much limited to  
5 the Trinity Broadcasting Network owned and operated stations.

6           Q     And am I to presume from that that Community  
7 Educational Television stations are not part of the owned and  
8 operated stations, then?

9           A     That is correct.

10          Q     Please turn to Mass Media Exhibit 108.

11          A     Yes, sir.

12          Q     Would I be correct that you did not review this  
13 document prior to its transmission to the IRS?

14          A     Yes, sir, I have no recollection of reviewing this  
15 document.

16          Q     And do you have any knowledge as to whether any  
17 board member of Translator TV, Inc. reviewed this document  
18 prior to its transmission to the IRS?

19          A     I have no knowledge of that, sir.

20          Q     And do you recall there being any discussion among  
21 the board members or with board members of Translator TV, Inc.  
22 as to the figures that are reflected in this Form 990 for 1985  
23 for Translator TV, Inc.?

24          A     No, sir.

25          Q     Please turn to Mass Media Exhibit 110.

1 A Yes, sir.

2 Q And turn, if you will -- well, actually just so  
3 you're oriented, this is the financial report for the year  
4 ending December 31, 1985.

5 A Yes.

6 Q And that according to page 4, this report was  
7 transmitted to the board of directors of Trinity Broadcasting  
8 Network on or about July 31, 1986, do you see that?

9 A Yes, I see that.

10 Q Now, if you turn to pages 8 and 9, do you see the  
11 columns for Translator TV, Inc.?

12 A Yes, sir.

13 Q Do you recall having any discussions with the  
14 accounting firm that put this document together as to the  
15 propriety or lack thereof of including Translator TV, Inc. in  
16 this audit report?

17 A No, sir.

18 Q With respect to the fund balance, if you look on  
19 page 8, according to this document the fund balance for  
20 Translator TV, Inc. as of December 31, 1985 is now  
21 \$341,945.00, do you see that?

22 A Yes, sir.

23 Q Do you recall there being any discussion among the  
24 board members of Translator TV, Inc. about this figure?

25 A No, sir.

1 Q Do you recall looking at this figure, seeing it and  
2 wondering what is going on and asking anyone about it?

3 A No, sir, since it was obviously no income and still  
4 very little activity with Translator TV, Inc. it was sort of  
5 lost in the much larger numbers of the other entities that had  
6 television stations.

7 Q Well, if I recall something from your earlier  
8 testimony, a figure in the nature of \$300,000 is quite a  
9 significant figure.

10 A I'll agree with you to that extend but when you look  
11 at combined totals of \$53,000,000 and other stations with  
12 fully filled out lines with, you know, contributions and  
13 telecasting and production and cost sharing and so on, I'm  
14 sorry, I just am afraid I simply didn't focus on that.

15 Q Now, please turn to page 10, under the heading  
16 "organization".

17 A Yes, sir.

18 Q Do you see a reference to direct affiliates?

19 A Letter "A"?

20 Q Yes, sir.

21 A Yes.

22 Q Now, that Translator TV, Inc. is included? Do you  
23 see that?

24 A Yes.

25 Q Now, we went over this with respect to the 1984

1 audit report and the same reference appeared and I had asked  
2 you a series of questions about it and would I be correct that  
3 you had had no conversation with the accountant to determine  
4 why Translator TV, Inc. is listed here as a direct affiliate?

5 A The auditors and I think even I myself because of  
6 the commonality of board members again would have assumed that  
7 it was a direct affiliate.

8 Q But outside of that assumption I take it you had no  
9 conversation with anyone in the accounting firm to determine  
10 the propriety of listing Translator TV, Inc. in this fashion?

11 A No, sir.

12 Q Now, I recall from last years report that the same  
13 entity underneath Translator TV, Inc. called North County  
14 Christian Center, Inc. was included also as a direct  
15 affiliate.

16 A Yes, sir.

17 Q Can you tell us what North County Christian Center,  
18 Inc. is?

19 A That was the name of the church I had testified  
20 earlier that was donated by a retiring minister to Trinity  
21 whose name was subsequently changed to Trinity Christian  
22 Center of San Marcos.

23 Q Was there a separate board for this North County  
24 Christian Center, Inc.?

25 A I believe there was but it would have been some of

1 the same board members of Trinity Broadcasting Network. I,  
2 for example, was and am still today the president of that  
3 corporation.

4 Q And do you know who else were the board members at  
5 this time?

6 A I really would have to review that.

7 Q Please turn to Mass Media Exhibit 111.

8 A Yes, sir.

9 Q Now, in the first paragraph there is the title,  
10 first of all, "Beaumont on the Air" and then in the second  
11 sentence of that first paragraph it says, "we had just signed  
12 Channel 34, Beaumont, on the air June 20." Now, Beaumont is a  
13 CET station, correct?

14 A Yes.

15 Q In context, then, could you tell us what the "we" is  
16 in the second sentence of that first paragraph?

17 A I think again -- I know again, the "we" certainly  
18 includes the broad spectrum of the network as we discussed and  
19 in this case, the narrower context would be CET.

20 Q Now, I'd like you to turn to pages 2 and 3 and I  
21 think I have this matched up right but if not, I'm sure you  
22 can tell me, there's a picture, it looks like of you moving  
23 some dials around --

24 A Yes.

25 Q -- and then there's a caption that appears on page 3



1 with a little arrow pointing toward the picture that says,  
2 "Don't touch that dial, Paul."

3 A Yes.

4 Q Now, if you go to the last paragraph or the la--  
5 yes, the last paragraph of that caption it states "Our  
6 educational station is a full TBN affiliated station." Do you  
7 see that?

8 A Yes.

9 Q Can you tell me what that means, a full TBN  
10 affiliated station?

11 A I believe again that simply recognizes some  
12 commonality of board members.

13 Q All right, so we're talking something in addition to  
14 simply a programming relationship.

15 A Yes, and again, Mr. Shook, I didn't write -- I do  
16 not write the captions here so in the minds of some of the  
17 other staff members, I'm sure there was some confusion as to  
18 owned and operated, full affiliated, program affiliated but I  
19 take that simply to mean by full TBN affiliated station not  
20 only a program affiliation arrangement but some commonality of  
21 board members.

22 Q You do recall reviewing the newsletter though before  
23 it went out or it would have been your practice to so review  
24 it?

25 A Yes, it certainly would have been my practice.

1 Q Turning to page 4, you see the listing of stations  
2 down at the bottom?

3 A Yes, sir.

4 Q And that both Beaumont and Harlingen are listed, if  
5 you go to the fourth column?

6 A Yes.

7 Q Now, previously when we had had a listing of  
8 stations, by and large they were the owned and operated  
9 stations, is this supposed to be -- it this supposed to  
10 reflect some change now because Beaumont and Harlingen are  
11 here or are we still looking at owned and operated stations?

12 A Please remember, Mr. Shook, that the purpose --  
13 there's no representation here as to really what the ownership  
14 of these stations is. This was simply a little convenient  
15 listing so that the viewers in these cities would know where  
16 their studios were located because we had live audiences come  
17 in for some of the local programming so the purpose of this  
18 was not to represent any particular ownership or lack thereof,  
19 it was just a convenient directory of station locations for  
20 the convenience of the viewers.

21 Q Now, please turn to Mass Media Exhibit 112.

22 A Yes, sir.

23 Q In the second full -- well, actually you have the  
24 title "Gadsden/Birmingham on the Air" and then when you go to  
25 the second paragraph there's also the reference to

1 Gadsden/Birmingham. Gadsden/Birmingham was not an owned and  
2 operated station, correct?

3 A No, sir.

4 Q And do you have a recollection as to who the  
5 licensee was?

6 A Yes, that's All American Television.

7 Q And that All American does not have any common board  
8 members with TBN.

9 A No, sir.

10 Q Please turn to Mass Media Exhibit 113.

11 A Yes, sir.

12 Q And you see that this is for October 1986?

13 A Yes.

14 Q In the first paragraph, the third sentence, it  
15 reflects Dallas is granted.

16 A Yes.

17 Q And that's TBN owned and operated No. 12, correct?

18 A Correct.

19 Q Please turn to page 4.

20 A Yes, sir.

21 Q The listing of the stations down at the bottom, I  
22 would direct your attention to the third column, the last  
23 entry.

24 A Yes, sir.

25 Q And you see that there's now a reference for

1 Alabama/Birmingham/Gadsden but there's a little star in front  
2 of it.

3 A Yes, sir.

4 Q And when you look to see what that star represents  
5 it seems to say that it's an affiliated station.

6 A Yes.

7 Q So apparently there's some distinction here between  
8 affiliated stations and other stations.

9 A We're doing our best here now to distinguish owned  
10 and operated and stations that have a commonality of board  
11 members from those who do not.

12 Q Okay, we're moving on to Volume 3. Dr. Crouch,  
13 could you please turn to Mass Media Exhibit 114.

14 A Yes, sir.

15 Q Now, this is an affiliation agreement between  
16 Trinity Broadcasting Network and All American Television. The  
17 date that's reflected here is the first day of October 1986,  
18 just to help orient you in terms of time and if we go to page  
19 8, the two signatures there, I take it one of them is yours.

20 A Yes.

21 Q Now, did you have any involvement in the negotiation  
22 of this agreement?

23 A I certainly had some involvement in the production  
24 of the agreement but I don't recall any direct involvement in  
25 the negotiation of it with Mr. Arguinzoni here.

1 Q Well, do you know who did negotiate the agreement on  
2 behalf of Trinity Broadcasting Network?

3 A I believe Mrs. Duff would have.

4 Q Do you know whether there was any legal  
5 representation for Trinity Broadcasting Network in respect to  
6 the drafting or negotiation of this affiliation agreement?

7 A I recall that Mr. May and I believe even Mr. Juggert  
8 had input into the legal aspects of this contract.

9 Q Both of whom were representing TBN, correct?

10 A Yes.

11 Q They were not representing All American TV?

12 A I don't know, they were certainly representing TBN,  
13 whether or not -- I know Mr. Juggert was not representing All  
14 American Television. Mr. May could have been but I really  
15 don't know.

16 Q You don't know. Please turn to Mass Media Exhibit  
17 115.

18 A Yes, sir.

19 Q Now, this one's going to be a little tricky to read,  
20 but what I'd like you to do is look at the listing on page 3  
21 under the heading "The List of Miracles This Year Are" and  
22 there are a list of seventeen matters there. Do you see that?

23 A Are you sure that's page 3?

24 JUDGE CHACKIN: If you don't have it use my book.

25 MR. CROUCH: I have it, sir. Yeah, victories this

1 year.

2 JUDGE CHACHKIN: All right.

3 MR. CROUCH: Oh, here it is.

4 JUDGE CHACHKIN: The witness has it.

5 MR. COUCH: I'm sorry, it is my error, I have it  
6 now.

7 BY MR. SHOOK:

8 Q Now, I would be correct, would I not that this list  
9 of miracles includes references to both Trinity owned and  
10 operated stations as well as stations which have program  
11 affiliation agreements with Trinity?

12 A Yes, sir.

13 Q Now, turning to page 6 --

14 A Yes, sir.

15 Q -- we have the studios located at and of all the  
16 stations listed here, there's only one with an asterisk and  
17 that's the Alabama/Birmingham station, do you see that?

18 A Yes, sir.

19 Q And that's noted as an affiliated station.

20 A Yes.

21 Q So would it be correct that the other stations, at  
22 least in the minds of the people who put together this  
23 newsletter, are owned and operated stations?

24 A Certainly with the commonality of board members and  
25 I think we've pretty much determined that if a majority of

1 | those board members were the Trinity board, they were, in  
2 | essence, owned and operated stations.

3 |       Q     Please turn to Mass Media Exhibit 117.

4 |       A     Yes, sir.

5 |       Q     Now, we're up to December of 1986.

6 |       A     Yes.

7 |       Q     And if you turn to the listing on page 4 --

8 |       A     Yes, sir.

9 |       Q     -- we have the same scenario in terms of a listing  
10 | of studio locations and stations.

11 |       A     Yes, sir.

12 |       Q     And we have Alabama/Birmingham noted as an  
13 | affiliated station--

14 |       A     Yes.

15 |       Q     -- whereas the others are not so noted.

16 |       A     Correct.

17 |       Q     Please turn to Mass Media Exhibit 119.

18 |       A     Yes, sir.

19 |       Q     Now, I recognize that this letter is not copied to  
20 | you nor directed to you but please take a couple of minutes to  
21 | read it anyway.

22 |       A     Yes, sir, I've generally reviewed it.

23 |       Q     Now, the date of this letter is December 22, 1986  
24 | and the letter reflects in the first paragraph that there were  
25 | telephone conversations, meaning more than one apparently,

1 between Jane Duff and Colby May relative to the Odessa, Texas  
2 situation.

3 A Yes, sir.

4 Q What I would like to know is whether you had any  
5 conversations with Colby May in this time period about the  
6 Odessa, Texas situation?

7 A I certainly may have, I was aware of the possibility  
8 for indeed the first contact for the station actually is, my  
9 memory tells me, came from a Mr. Dave Roevers, the brother of  
10 Al Roevers who is a programmer on Trinity Broadcasting. He's  
11 the one who first spoke to me about the possibility of TBN or  
12 some TBN affiliated organization acquiring this station.

13 Q And that was in the context of we have this permit  
14 and for whatever reason we're unable to build it.

15 A Correct.

16 Q What understanding, if any, did you have as to  
17 whether there was any time pressure in terms of acquisition of  
18 the permit because a construction permit has, you know,  
19 generally a twenty-four month life to it?

20 A My general impression and memory was that it was  
21 becoming pretty imperative that the station be built or the  
22 time frame was running out.

23 (Off the record. Back on the record.)

24 Q You mentioned having conversation with Dave Roevers,  
25 do you recall whether there was one or more than one and, if



1 so, how long a period of time are we talking about here?

2 A My best recollection is that the first contact was  
3 actually in person, Dave Roever and I meet occasionally, he is  
4 a fairly frequent guest on the Praise the Lord program and a  
5 programmer, so I think that was a face-to-face meeting where  
6 he first advised me of the potential of this permit being  
7 acquired by Trinity or one of our affiliates. There may have  
8 been other telephone conversations, I don't have any  
9 independent recollection of that.

10 Q Do you recall any conversations directly with Al who  
11 was the permittee?

12 A No, sir, to this day, I have never even met Al  
13 Roever to my memory and I don't even have any recollection of  
14 a telephone conversation with him.

15 Q Can you -- do you have any recollection as to over  
16 what period of time your conversations took place with Dave  
17 Roever relative to the availability of Odessa?

18 A It would be several weeks but I just don't have any  
19 way of identifying that.

20 Q With the information imparted to you from Dave  
21 Roever about the availability of Odessa, did you then make  
22 contact with Colby May and bring the situation to his  
23 attention?

24 A I may have contacted Colby May or I may have  
25 contacted Mrs. Duff or both and probably did, I just don't